

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

The Woodlands Pride, Inc.; Abilene
Pride Alliance; Extragrams, LLC; 360
Queen Entertainment LLC; Brigitte
Bandit,

Plaintiffs,

v.

Civil Action No. 4:23-cv-02847

Angela Colmenero, in an official
capacity as Interim Attorney General of
Texas; The Woodlands Township;
Montgomery County, Texas; Brett
Ligon, in an official capacity as District
Attorney of Montgomery County; City
of Abilene, Texas; Taylor County,
Texas; James Hicks, in an official
capacity as District Attorney of Taylor
County; Delia Garza, in an official
capacity as County Attorney of Travis
County; Joe D. Gonzalez, in an official
capacity as District Attorney of Bexar
County,

Defendants.

PLAINTIFFS' MOTION FOR LEAVE TO FILE EXCESS PAGES

Plaintiffs The Woodlands Pride, Inc.; Abilene Pride Alliance; Extragrams, LLC; 360 Queen Entertainment LLC; and Brigitte Bandit (collectively, “Plaintiffs”) bring this Motion for Leave to File Excess Pages for their Motion for a Temporary Restraining Order and Preliminary Injunction (“Motion”).

Pursuant to Local Rule 7 and Judge Hittner’s court procedures, Plaintiffs seek leave to file the Motion that is 54 pages long. Plaintiffs require excess pages for this Motion because this lawsuit challenges a newly enacted state statute with numerous applications. Plaintiffs include two nonprofit organizations, two businesses, and one individual affected by this law—each of whom is affected by Senate Bill 12 in multiple ways. Plaintiffs also allege four causes of action that require a full analysis of the new law’s potential applications. *See Espinoza v. San Benito Consol. Indep. Sch. Dist.*, No. 1:14-CV-115, 2016 WL 10744704, at *3 (S.D. Tex. Sept. 13, 2016) (Tagle, J.) (noting complexity and number of issues may establish “good cause” to exceed the page limit).

This request for leave to file excess pages is not brought for purposes of delay but to enable the Plaintiffs to present the relevant facts and legal arguments to the Court, as justice requires, and to meet Plaintiffs’ burden of establishing every factor necessary for seeking a temporary restraining order and preliminary injunction.

Plaintiffs ask the Court to grant this motion for leave to file excess pages.

Respectfully submitted,

/s/Brian Klosterboer

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**SDTX Admission Application Pending*

CERTIFICATE OF CONFERENCE

Plaintiffs notified Defendants of their intent to file this motion for excess pages on August 8, 2023. Defendants Angela Colmenero, Delia Garza, and the City of Abilene are unopposed to this motion. The other Defendants either have not responded or were unable to determine their position on this motion before this filing.

/s/Brian Klosterboer
Brian Klosterboer

CERTIFICATE OF SERVICE

The undersigned certifies that on the 9th day of August, 2023, a true and correct copy of the above document was served via the CM/ECF system to all counsel of record and via e-mail to all Defendants and counsel who have not yet appeared on CM/ECF.

/s/Brian Klosterboer
Brian Klosterboer